

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

MICHAEL T. DREHER,

Plaintiff,

v.

**EXPERIAN INFORMATION
SOLUTIONS, INC.; CARDWORKS,
INC., CARDWORKS SERVICING,
LLC,**

Defendants.

CASE NO. 3:11-cv-00624-JAG

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S
CONSENT MOTION TO AMEND THE JOINT DISCOVERY PLAN**

Defendant, Experian Information Solutions, Inc. ("Experian"), by counsel, files this consent motion to amend the parties' joint discovery plan and states as follows:

The parties continue to conduct discovery consistent with the schedule set by the joint discovery plan. Because the number of witnesses to be deposed is higher than was anticipated by the parties at the time the schedule was set and the parties have had difficulty finding dates for depositions agreeable for these witnesses and all of the parties, Experian and the Plaintiff require additional time to complete the discovery sufficient for the Motion for Summary Judgment and the response thereto, respectively. Experian's counsel has communicated with counsel for Plaintiff, Michael Dreher, who is agreeable to the required extension, which extends the date for Experian to file its Motion for Summary Judgment to and including the later of August 6, 2012 and fourteen (14) days following the completion of the Plaintiff's deposition of the Experian employees that Plaintiff has identified as relevant to the issue of willfulness. All dates that follow will be extended accordingly without moving the trial date. A proposed Agreed Order is

being circulated for endorsement by counsel for Plaintiff, Michael T. Dreher, and Experian, a copy of which is attached hereto as Exhibit 1.

WHEREFORE, Defendant, Experian Information Solutions, Inc., by counsel, hereby requests that the Court enter an Order: (1) granting Experian's Consent Motion to Amend Joint Discovery Plan; (2) provide Experian with an extension of time to file its Motion for Summary Judgment until on or before the later of August 6, 2012 and fourteen (14) days after the Plaintiff's deposes Experian employees he has identified; and (3) awarding Experian such further relief as the Court deems appropriate.

EXPERIAN INFORMATION SOLUTIONS, INC.

By: /s/David N. Anthony

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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of July 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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